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Josh Foley Connecticut State Election Enforcement Commission 20 Trinity Street Hartford, CT 06106

RE: Request for Reconsideration Declaratory Ruling in Response to "Opinion of Counsel 2018-05: Use of Public Funds to Offset Candidate's Child Care Costs"

I write to comment on Declaratory Ruling in Response to "Opinion of Counsel 2018-05, which was submitted by Caitlin Clarkson Pereira, who is running for the state legislative seat in Connecticut's 132nd District. The Connecticut State Election Enforcement Commission should allow Ms. Clarkson Pereira to use campaign funds to pay for the child care expenses she must incur to run for office. Denying Ms. Clarkson Pereira's request to use campaign funds for childcare would ignore the precedent set by the Federal Election Commission in May 2018.

In May 2018 the Federal Election Commission (FEC) granted me permission to use my campaign funds on childcare expenses "to the extent such expenses are incurred as a direct result of campaign activity." FEC Vice Chair Ellen Weintraub said "I have a long track record of being very concerned with personal use issues but the request that you've made is tailored. We're not creating a wholesale carve out for childcare. You still can't use campaign funds for babysitting on date night, but to the extent that you need it and other candidates similarly situated in order to facilitate their campaign work, this answer, should we approve it, would allow campaign funds to be used for those expenses." During the 2018 midterm elections, nine federal candidates used their campaign funds to cover the cost of childcare.

In June 2018, the Texas, Wisconsin, and Alabama Ethics Commissions all ruled that candidates may use campaign funds to pay for childcare while running for office. In July 2018, the Arkansas Ethics Commission followed suit, in October 2018, the New York City Council passed legislation to permit campaigns to cover childcare costs, and in February 2019, the Louisiana State Ethics Commissions approved the use of campaign funds on childcare as well. New York City Council Majority Leader, Laurie A. Cumbo said, "To truly support women as political leaders, we must look at the reality of their lives. For many women, childcare is an insurmountable barrier when it comes to running for office."

According to the United Stated Department of Labor, women spend almost double the time as men on child care and housework, even in families where both parents work full time. Women, and particularly moms of young children, face unique challenges when running for office, and yet, we need their voices at the table to ensure that our government is reflective of our society. Women make up more than 51% of Connecticut's population, and yet make up less than 33% of your state legislature.

Because of the cultural and structural hurdles moms face, many choose to wait until their children are grown before running for political office. Because they wait to get started, it's harder for women to achieve leadership positions at the same rates as men. There is a reason that more than half of Congress members are millionaires and so many State Representatives are wealthy – running for offices takes a huge toll on a family's budget, especially while raising children.

Not approving Ms. Clarkson Pereira's request discourages young mothers from seeking elective office and deprives working parents of the opportunity to serve their community. Allowing candidates to use campaign funds on childcare removes a major financial obstacle for working families and mothers at a time when women are increasingly considering elected office. For these reasons, I ask the Commission to grant Ms. Clarkson Pereira's request. Thank you.

Very truly yours,

Liuba Grechen Shirley Former Congressional Candidate CEO and Founder, Vote Mama